

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

MICHAEL J. DANIELS, et al.  
*Plaintiffs*

v.

AETC II PRIVATIZED HOUSING, LLC, ET AL.

*Defendants*

§  
§  
§  
§  
§  
§  
§

Cause No. SA-19-CA-01280-FB

---

**PLAINTIFFS' NOTICE OF DEPOSITION OF CORPORATE REPRESENTATIVE(S) OF  
AETC II PRIVATIZED HOUSING, LLC AND AETC II PROPERTY MANAGERS, LLC  
PURSUANT TO RULE 30(b)(6)**

---

**TO:** Walter H. Boone & Jennifer J. Skipper  
BALCH & BINGHAM, LLP  
188 East Capitol Street, Suite 1400  
Jackson, Mississippi 39201  
and  
Julia W. Mann & Erica Benites Giese  
JACKSON WALKER, LLP  
112 E. Pecan Street, Suite 2400  
San Antonio, Texas 78205

*Attorneys for Defendants*

**PLEASE TAKE NOTICE** that, on June 22, 2022, commencing at 9 a.m., Plaintiffs in the above-captioned case will take the deposition of the corporate representative(s) of Defendants AETC II Privatized Housing, LLC and AETC II Property Managers, LLC, by and through their duly designated officers, directors, agents or other representatives who shall be designated to testify on Defendants' behalf regarding all information known or reasonably available to them with respect to the subject matters identified in *Exhibit A*.

The deposition will be conducted by remote audio-visual means arranged by and through Kim Tindall & Associates, court reporters.

**EXHIBIT**

**1**

Plaintiffs request that Defendants provide written notice at least three (3) calendar days before the deposition of the name(s), office(s) held, and employment position(s) of the individual(s) designated to testify on Defendants' behalf.

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendants' designated representative(s) are requested to produce the following documents at the deposition:

- 1.) Current Resume or CV;
- 2.) All documents reviewed by the deponent in preparing for the deposition; and
- 3.) All documents prepared by the deponent in preparing for the deposition.

Respectfully submitted,

**PULMAN, CAPPuccio & PULLEN, LLP**

By: /s/ Ryan C. Reed

Ryan C. Reed

Texas State Bar No. 24065957

[rreed@pulmanlaw.com](mailto:rreed@pulmanlaw.com)

Randall A. Pulman

Texas State Bar No. 16393250

[rpulman@pulmanlaw.com](mailto:rpulman@pulmanlaw.com)

2161 NW Military Highway, Suite 400

San Antonio, Texas 78213

(210) 222-9494 Telephone

(210) 892-1610 Facsimile

**WATTS GUERRA LLP**

Mikal C. Watts

Texas State Bar No. 20981820

[mcwatts@wattsguerra.com](mailto:mcwatts@wattsguerra.com)

Francisco Guerra, IV

Texas State Bar No. 00796684

[fguerra@wattsguerra.com](mailto:fguerra@wattsguerra.com)

Robert Brzezinski

Texas State Bar No. 00783746

[rbrzezinski@wattsguerra.com](mailto:rbrzezinski@wattsguerra.com)

Jennifer Neal

Texas State Bar No. 24089834  
[jneal@wattsguerra.com](mailto:jneal@wattsguerra.com)  
4 Dominion Drive  
Bldg. 3, Suite 100  
San Antonio, Texas 78257  
(210) 447-0500 Telephone  
(210) 447-0501 Facsimile

**MORIARTY SKIVER**  
James. R. Moriarty  
Texas State Bar No. 14459000  
[jim@moriarty.com](mailto:jim@moriarty.com)  
4119 Montrose, Suite 250  
Houston, Texas 77006  
(713) 528-0700 Telephone  
(713) 528-1390 Facsimile

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 16<sup>th</sup> day of May, 2022, a true and correct copy of the foregoing document was filed with the Court's ECF system and was served via electronic mail on counsel for Defendants.

Walter Boone  
Jennifer Skipper  
BALCH & BINGHAM LLP  
1888 East Capitol Street, Suite 1400  
Jackson, Mississippi 39201

Julia W. Mann  
Erica Benites Giese  
JACKSON WALKER LLP  
112 E. Pecan Street, Suite 2400  
San Antonio, Texas 78205

/s/ Ryan C. Reed  
Ryan C. Reed

**Exhibit A**

- 1) Organizational structure of Defendants, including the roles and duties of Defendants and their employees.
- 2) Lease agreements with Plaintiffs and any alleged conversations or discussions with the Plaintiffs concerning said lease agreements.
- 3) Maintenance and known issues with the Randolph and Laughlin AFB houses managed by Defendants during the tenure of their contract with the United States Air Force.
- 4) Defendants' use of the Yardi system.
- 5) Maintenance standards applicable to housing at Randolph and Laughlin AFB during the tenure of Defendants' contract at each respective base.
- 6) Accounting of Revenues from rents Defendants received for housing at Randolph and Laughlin AFB.
- 7) Job responsibilities of persons employed by Defendants at Randolph and Laughlin AFB.
- 8) Mold remediation standards applicable to housing at Randolph and Laughlin AFB.
- 9) Air quality, mold, moisture, or structural testing done by or at the behest of Defendants at any Randolph or Laughlin AFB home.
- 10) The history of, creation of, scope of, implementation of, and current status of the "Humidity Pilot Program" or the "Dehumidification Project" at Randolph and Laughlin AFB.